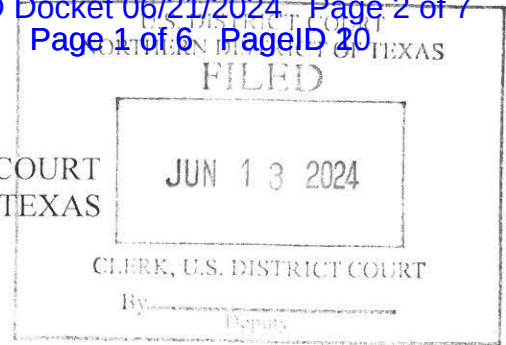


# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:24-MJ-479

TIMOTHY MULLER (01)

**CRIMINAL COMPLAINT**

**Alleged Offense:**

I, Special Agent Michael Gantt, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

*Interstate communications*

On or about June 11, 2024, in the Northern District of Texas, defendant **Timothy Muller**, knowingly and willfully did transmit in interstate commerce a communication to [REDACTED], and the communication contained a threat to kidnap and injure [REDACTED] and his family.

In violation of 18 U.S.C. § 875(c).

*Influencing, Impeding, or retaliating against a Federal official*

On or about June 11, 2024, in the Northern District of Texas, defendant **Timothy Muller**, did threaten to assault, kidnap, and murder Federal Bureau of Investigation Supervisory Special Agent [REDACTED] (FBI SSA [REDACTED]), with the intent to: (1) impede, intimidate, and interfere with FBI SSA [REDACTED] while he was engaged in his official duties, and (2) retaliate against FBI SSA [REDACTED], on account of the performance of his official duties.

In violation of 18 U.S.C. § 115(a)(1)(B).

**Probable Cause:**

I, Special Agent Michael Gantt, Federal Bureau of Investigation ("FBI") being duly sworn, do hereby state that I am a Special Agent with the Federal Bureau of Investigation ("FBI" or "Investigating Agency") and have been since January 2020. I am currently assigned to the Dallas Field Division, Fort Worth Resident Agency within the Violent Crimes Unit. I have received formal training from the FBI as well as training through contact with experts from

various law enforcement agencies regarding bank robbery investigations, Hobbs Act robberies, and other violent criminal offenses. I have used a variety of investigative techniques throughout investigations, including, but not limited to, visual surveillance, general questioning of witnesses, the use of: search warrants, confidential informants, undercover agents, pen registers/trap and trace devices, electronic mobile tracking/monitoring devices, and Title III wire interceptions.

1. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials, other investigative activities conducted, and investigative materials obtained during the investigation.

2. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for **Timothy MULLER** of Fort Worth, Texas, for violations of Title 18 U.S. Code § 875 (Interstate Communications), and Title 18 U.S. Code § 115(a)(1)(B) (Influencing, Impeding, or Retaliating against a Federal official). This affidavit does not include all facts known to me, but rather contains facts sufficient to support the issuance of an arrest warrant.

### **STATEMENT OF FACTS**

3. The allegations in this affidavit pertain to recent threats against an FBI agent and his immediate family members. There is probable cause to believe these threats were conveyed by telephonic communication services utilized by **Timothy MULLER**, who resides in the Northern District of Texas.

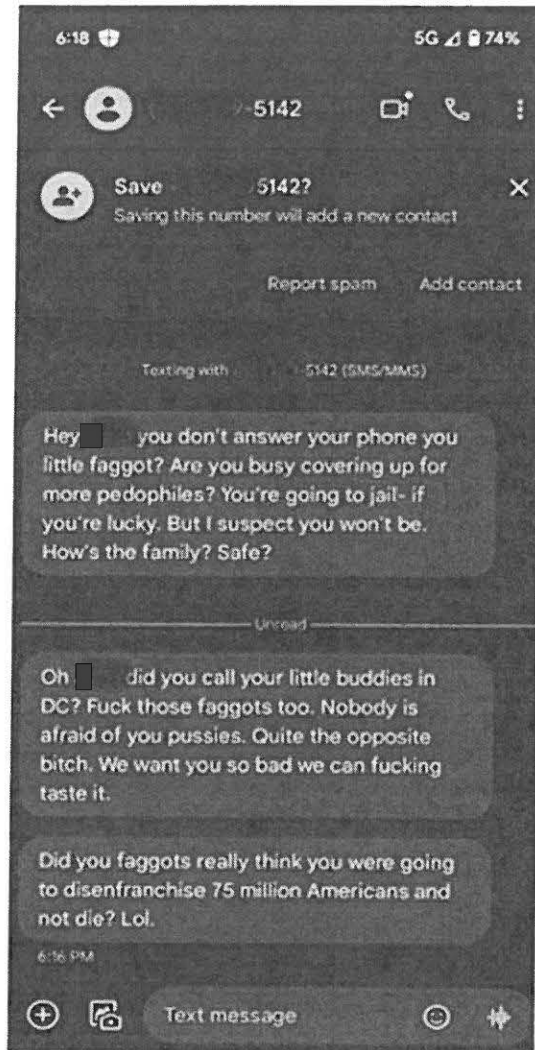
4. On June 11, 2024, at approximately 5:03pm EST, FBI Baltimore Supervisory Special Agent (SSA) [REDACTED] received a phone call from xxx-xxx-5142 (the Subject Telephone Number) on his FBI-issued cellular phone. The caller said, "Hey [REDACTED]" before SSA [REDACTED].

disconnected the call. A second call was immediately received by SSA [REDACTED], from the same phone number. The second call was not answered, and a voicemail was left by the user of the Subject Telephone Number. The voicemail was approximately one minute, five seconds long and in it a masculine voice stated the following:

*Hey [REDACTED], you little cock-sucking pussy! You can run, but you can't fucking hide. You covered up child pornography. You covered up [H. B.] raping his own fucking niece, you piece of fucking degenerate shit! So here's how it's gonna go: [T's] gonna win the re-election, and then we're gonna fucking go through the FBI and just start throwing you cock-suckers into jail. OR, you can steal another election, and then the guns will come out, and we'll hunt you cock-suckers down and slaughter you like the traitorous dogs you are in your own fucking homes. In your own fucking beds. The last thing you'll ever hear are the horrified shrieks of your widow and orphans. And then you know what we're going to do? Then we're going to string those fucking cock-suckers up. We're going to slaughter your whole fucking family, you fucking pedophile! It's like THAT now. So choose. Jail? Or getting strung up and lynched like the fucking traitor you are. That's what happens when you cover up for fucking pedophiles, you piece of fucking shit!*

5. In addition, a series of three text messages from the user of the Subject Telephone Number, **Timothy MULLER**, were then received by SSA [REDACTED], on his FBI-issued cellular phone, ending at approximately 6:16pm EST. A screenshot of the text messages is below, and included the following language, "... You're going to jail- if you're lucky. But I suspect you won't be. How's the family? Safe?" and "... We want you so bad we can fucking taste it." The third text message sent by the user of the Subject Telephone Number, **Timothy MULLER**, stated, "Did you [redacted] really think you were going to disenfranchise 75 million Americans and not die? Lol."





(Screenshot of text message sent by the user of the Subject Telephone Number to FBI SSA [redacted] on June 11, 2024.)

6. SSA [redacted] was previously named in open source reports describing his involvement in an FBI Baltimore investigation related to H.B. and a laptop obtained by the FBI. On June 11, 2024, multiple media outlets reported on the outcome of H.B.'s federal trial in the District of Delaware related to a 2018 firearm purchase.

7. On June 11, 2024, records were obtained for the Subject Telephone Number. According to the records received, the user of the account was "**Tim Muller**" with an address of xxxx Camp Bowie Boulevard, Fort Worth, Texas 76116. However, xxxx Camp Bowie Boulevard, Fort Worth, Texas 76116, is an AT&T retail store located in a shopping center

approximately .8 miles away from **Timothy MULLER's** residence, which is also in Fort Worth, Texas. Call detail record information shows the Subject Phone Number makes multiple outgoing phone call at 5:03 p.m. EST to SSA [REDACTED]'s FBI-issued cellular phone number to include a one minute 23 second phone call at 5:03:54 p.m. EST. This phone call is consistent with the time of the voicemail left to SSA [REDACTED]'s phone.

8. Furthermore, the cellular records corroborated that the user of the Subject Phone called and sent text messages to SSA's [REDACTED]'s FBI-issued cellular phone on June 11, 2024, at the approximate times listed above. Additionally, the records indicated the device utilized a cell tower providing service to the area of **Timothy MULLER's** residence in Fort Worth, Texas.<sup>1</sup>

9. A review of location data that was obtained showed the Subject Phone was in the Fort Worth, Texas area on June 11, 2024, and the device was in the vicinity of **Timothy MULLER's** residence.

10. As part of the investigation, an Instagram account associated with **Timothy MULLER** was identified. The profile photograph is of a white male consistent with other photographs of **MULLER** located on open sources. On August 4, 2019, this Instagram account posted a video with a voice that is consistent with the voice heard on the threatening voicemail.

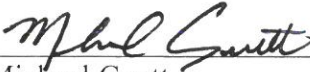
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<sup>1</sup> Open source databases available to law enforcement indicated **Timothy MULLER** was associated with the subject residential address, and a search of the Tarrant County Appraisal District's website indicated **Timothy MULLER** was the current owner.

CONCLUSION

Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that **Timothy MULLER** is in violation of Title 18 U.S. Code § 875(c) (Interstate Communications); and Title 18 U.S. Code § 115(a)(1)(B) (Influencing, Impeding, or Retaliating against a Federal official).



Michael Gantt  
Federal Bureau of Investigation  
Special Agent

Sworn to me at 2:03 a.m./p.m. in Fort Worth, Texas, on this 13TH day  
of JUNE, 2024.



HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE